

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Kris J Matura		
	Debtors	
Toyota Motor Credit Corporation		BK NO. 20-14225-elf
	Movant	
v.		CHAPTER 13
Kris J Matura		
	Respondent	

**OBJECTION OF TOYOTA MOTOR CREDIT CORPORATION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

("Movant"), by it Attorney, Leopold & Associates, PLLC, objects to the confirmation of the Debtor's Chapter 13 Plan as follows:

1. On April 28, 2018, the Debtor entered into an Agreement which was secured by a 2014 Toyota Avalon Hybrid with VIN #4T1BD1EBXEU025044.
2. On December 22, 2020, Movant filed a secured proof of claim stting forth a total secured debt of \$9,268.04 with an interest rate of 6.25%.
3. The Debtor's Plan fails to provide for any treatment of the Movant's secured claim.
4. Accordingly, Movant objects to Debtor's plan as it is not feasible in that it does not compensate the Movant's secured claim.
5. In addition, the plan fails to comply with the requirements of 11 U.S.C. §1322 and §1325.

WHEREFORE, the Movant pray that the Court denies the confirmation of the Debtor's plan and grant any other such further relief, at law or in equity as is just.

Date: February 1, 2021

/s/ Robert P Wendt, Esquire
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	Debtors(s)	
Toyota Motor Credit Corporation	Movant	
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CERTIFICATE OF SERVICE

I, Robert P Wendt, attorney for Movant, do hereby certify that true and correct copies of the foregoing Objection to Confirmation of Debtor's Chapter 13 Plan have been served on February 1, 2021, by first class mail, and/or electronic means upon those listed below:

Kris J. Matura
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U.S. Trustee
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Armonk, New York 10504

Date: February 1, 2021

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